

Exhibit D

DAPS' PROPOSED SCHEDULING ORDER

	<u>EVENT</u>	<u>DAP PROPOSAL</u>
1	First day on which 3rd Set of RFPs and other written discovery requests may be served.	June 24, 2025 (Tues)
2	<p>Deadline for proposals to the Court regarding whether or not to have tracks/bellwethers for discovery and trials, and other matters concerning composition and timing of trial(s).</p> <p><i>If disagreement, letter briefs of no more than 5 pages per proposal (i.e., if Class, DAPs, and Defendants disagree with each other, three letter briefs total)</i></p>	July 3, 2025 (Thurs)
3	Production of structured data samples (at least 50 lines)	July 24, 2025 (Thurs)
4	Deadline for defendants to produce materials produced in government investigations and/or other litigation, if permitted by Court	August 4, 2025 (Mon)
5	Answers and Counterclaims Under FRCP 12 to Consolidated Class Action Complaint and Amended Consolidated Master Direct Action Plaintiff Complaint	August 12, 2025 (Mon)
6	<p>Deadline for producing party's disclosure of initial list of its own proposed document custodians and custodial sources as to requests for which it agrees to produce documents [ESI Protocol V.A]</p> <p>Deadline to meet and confer regarding non-custodian document sources that the producing Party believes, based on its investigation to date, may reasonably be likely to contain unique information responsive to requests for which it agrees to produce documents [ESI Protocol V.B]</p> <p>Deadline to meet and confer regarding (i) potential use and identification of search terms, tools, or techniques, (ii) use of technology assisted review or artificial intelligence ("TAR/AI") in whole or part to cull any corpus of materials, and (iii) all parameters for scoping the review and production efforts (e.g., application of date ranges, custodians, non-custodial sources, etc.) for requests for which the producing party agrees to produce documents. [ESI Protocol V.E.1.a]</p>	August 25, 2025 (Mon)

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7	By no later than 45 days after service of responses and objections to the third sets of requests for production, the Parties will: (a) submit a TAR/AI Protocol to the Court or (b) submit letter briefs of no more than 5 pages total for Plaintiffs and one letter brief of no more than 5 pages total for Defendants concerning any disputes as to the TAR/AI Protocol. [from ESI Protocol Section E.2.a.]	September 8, 2025 (Mon)
8	Deadline to submit agreed deposition protocol and agreement on number of fact depositions, or joint motion setting forth areas of dispute	September 8, 2025 (Mon)
9	Joint status report and a proposed order concerning agreements on the scope and format of production of structured data or, if disagreement on the proposed order, Plaintiffs collectively may file a letter brief of up to 10 pages and Defendants collectively may file a letter brief of up to 10 pages.	August 18, 2025 (Mon) 25 days after submission of data samples
10	Deadline to complete search methodology negotiations and submit any remaining search term disputes relating to 3rd RFPs. ESI Protocol Section V.E.3.e-f (page 27-28).	September 12, 2025 (Fri)
11	Deadline to complete production of structured data requested in Plaintiffs' and Defendants' Third Set of RFPs	October 16, 2025 (Thurs) This deadline is necessary as many subsequent dates are contingent upon completion of data production.
12	Deadline to complete production of documents from up to 5 priority custodians per party	November 11, 2025 (Tues)
13	Deadline for any motions to amend the pleadings	January 21, 2026 (Weds)
14	Deadline regarding document productions in response to Third Set of RFPs	December 12, 2025 (Fri) (completion) ~6 months from service of 3d set of RFPs
15	Last day on which parties may serve requests for production, with the exception of witness-specific requests for production directly related to scheduled depositions	April 17, 2026 (Fri) ~75 days before close of fact discovery

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16	Last day on which parties may serve interrogatories	May 19, 2026 (Tue) ~45 days before close of fact discovery
17	Close of Fact Discovery	July 3, 2026 (Fri) 13 months after denial of motion to dismiss
18	Class and DAP Plaintiffs' Opening Merits and Class Certification Expert Reports	August 17, 2026 (Mon) 45 days following close of fact discovery
19	Defendants' Merits and Class Certification Opposition Expert Reports	October 1, 2026 (Thurs) 45 days following opening reports
20	Class and DAP Plaintiffs' Rebuttal Expert Reports	November 16, 2026 (Mon) 46 days following opposition reports
21	Close of Expert Discovery	January 6, 2027 (Wed) 45 days following rebuttal reports (plus one week to account for holidays)
22	Class Certification Motion	N/A
23	Class Certification Opposition Briefs	N/A
24	Class Certification Reply Briefs	N/A
25	Class Certification Hearing	Court's discretion
26	Summary Judgment Motions	February 22, 2027 (Mon) Can be simultaneous with class certification motions or

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		DAPs and Class proceed on separate schedules
27	Summary Judgment Opposition Briefs	April 8, 2027 (Mon) Can be simultaneous with class certification motions or DAPs and Class proceed on separate schedules
28	Summary Judgment Replies	May 24, 2027 (Mon) Can be simultaneous with class certification motions or DAPs and Class proceed on separate schedules
29	<i>Daubert</i> motions	DAPs propose that there can be one period for briefing on all <i>Daubert</i> , class certification, and summary judgment motions or DAPs and Class proceed on separate schedules.
30	Parties to submit joint status report or stipulation concerning (1) remand or transfer of cases centralized by Judicial Panel on Multidistrict Litigation, (2) deadlines for motions in limine briefing and evidentiary stipulations, and (3) deadlines for all remaining DAP actions	June 23, 2027 (Mon.) 30 days following completion of SJ briefing
31	Pre-Trial Conference	Approximately September 21, 2027 (Tue.), depending on the Court's availability 120 days following completion of SJ briefing

	<u>EVENT</u>	<u>DAP PROPOSAL</u>
32	First Trial Begins	Approximately October 5, 2027 (Tue.), depending on the Court's availability 14 days after pre-trial conference